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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91181516	
Party	Defendant Molnari, Inc.	
Correspondence Address	NATALIE HARRELL LAW OFFICE OF ARTHUR M. DULA 3106 BEAUCHAMP ST HOUSTON, TX 77009-7206 art@dula.com	
Submission	Answer	
Filer's Name	Natalie Eary	
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Signature	/natalie eary/	
Date	02/04/2008	
Attachments	Proceeding No. 91181516, Answer to Notice of Opposition.pdf ( 4 pages )(36531 bytes )	

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

BLUFIN, S.p.A.	§	
Opposer,	9 9 9 8	Opposition No. 91181516
v.	\$ § 8	
MOLNARI, INC.	\$ <b>\$</b>	
Applicant	§ §	

## **ANSWER TO NOTICE OF OPPOSITION**

Now comes Applicant, Molnari, Inc. ("Applicant") and for its Answer to the Notice of Opposition filed by Opposer, Blufin, S.p.A. ("Opposer"), submits the following averments and denials, to wit:

- Applicant admits only that the records of the United States Patent and Trademark
   Office reveal Opposer's address as indicated in Paragraph 1 of the Notice of
   Opposition.
- Applicant admits the allegations contained in Paragraph 2 of the Notice of Opposition.

- Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Notice of Opposition and therefore denies them.
- 4. Applicant admits only that the records of the United States Patent and Trademark Office reveal Opposer's U.S. trademark registration as indicated in Paragraph 4 of the Notice of Opposition.
- 5. Applicant admits only that the records of the United States Patent and Trademark Office reveal Opposer's U.S. trademark registration as indicated in Paragraph 5 of the Notice of Opposition.
- 6. Applicant admits the allegations contained in Paragraph 6.
- 7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Notice of Opposition and therefore denies them.
- 8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of the Notice of Opposition and therefore denies them.
- Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9 of the Notice of Opposition and therefore denies them.
- 10. Applicant admits the allegations set forth in paragraph 10 of the Notice of Opposition only so far as Applicant has not used the mark shown in the application prior to the alleged date of first use of the marks of Opposer. The

allegation that Applicant's registration and use of its mark will cause dilution of

Opposer's marks is denied.

11. Applicant is without knowledge or information sufficient to form a belief as to the

truth of the allegations contained in Paragraph 11 of the Notice of Opposition and

therefore denies them.

12. The allegations contained in Paragrpah 12 of the Notice of Opposition are denied.

13. The allegations contained in Paragraph 13 of the Notice of Opposition are denied.

14. The allegations contained in Paragraph 14 and sub-paragraphs 14 (a), 14 (b), and

14 (c) of the Notice of Opposition are denied.

15. The allegations contained in Paragraph 15 of the Notice of Opposition are denied.

WHEREFORE, Applicant requests that the Notice of Opposition be dismissed in

its entirety, and Applicant's application proceed to registration.

Date: 02/04/2008

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Counsel for Applicant

Molnari, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of February, 2008, I served a true and complete copy of the foregoing ANSWER TO NOTICE OF OPPOSITION upon counsel for the opposing party by depositing same with the United States Postal Service as First Class Mail, postage pre-paid, in an envelope addressed as follows:

Kathleen A. Costigan, Esq. Hedman & Costigan, P.C. 1185 Avenue of the Americas New York, NY 10036-2646

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